

## IN THE UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:  
ALL CASES

Case No. 23-md-03084-CRB

**DECLARATION OF ANDREW R.  
KAUFMAN IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

I, Andrew R. Kaufman, declare:

1. I am an attorney in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP. I am a member of the State Bars of Wisconsin, New York, and Tennessee and am admitted to practice pro hac vice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were designated by Uber as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”, Plaintiffs filed the following under seal:

Document	Description	Designating Party
[Unredacted] Plaintiffs’ Motion to Compel	Portion of briefing referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Declaration of Roopal P. Luhana	Portion of declaration referring to documents and information designated confidential or highly confidential	Uber

Document	Description	Designating Party
Exhibit A	1/27/312 Letter from V. Gromada	Uber
Exhibit B	1/31/25 Declaration of William Anderson	Uber
Exhibit C	Uber-produced document bates stamped UBER_JCCP_MDL002274069	Uber
Exhibit D	Uber-produced document bates stamped UBER_JCCP_MDL002273895	Uber
Exhibit E	Uber-produced document bates stamped UBER_JCCP_MDL002563882	Uber
Exhibit F	Uber-produced document bates stamped UBER_JCCP_MDL002267528	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2025 in Milwaukee, Wisconsin.

/s/ Andrew R. Kaufman  
Andrew R. Kaufman